



121 SOUTH MAIN STREET
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SEP 12 2005

September 7, 2005

Mr. John F. Carter, Director
FDIC San Francisco Regional Office
25 Jessie Street at Ecker Square. Suite 2300
San Francisco, CA. 94105

Dear Mr. Carter,

We are a \$21,000,000 bank in a small town of 1,120 population located just fifteen miles west of St. Joseph, Missouri. To the west of us twenty five miles is the town of Hiawatha, Kansas and to the South seventeen miles is Atchison, Kansas. All three of these small towns have a Walmart Super center or is getting one in the near future. Both Hiawatha and Atchison are small enough that their downtown area is now almost nothing because Walmart has come in with lower prices and driven most of the retail business out. With the financial clout that Walmart has it is not inconceivable that with banking powers they could drive small banks out of business.

With Walmart as the only banking option retail competitors are forced to do their banking business with them at a very real disadvantage. They could make loan decisions based on the best competitive advantage for them. Mixing commerce and banking has and always will be a bad precedent. With a bank in every Walmart store it produces a tremendous concentration of economic power. Please reject the application for FDIC insurance coverage for the Utah based ILC and keep banking and commerce independent. Thank you.

Sincerely,

James A. Needham
President



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2005 SEP 12 AM 10:33

THAD G. GEIGER
Executive Vice President

September 7, 2005
FDIC San Francisco Regional Office
Director Johns F. Carter
25 Jessie Street at Ecker Square, Ste 2300
San Francisco, CA 94105

Dear Sirs:

I am writing in opposition to Wal Mart's application for deposit insurance for its pending Utah based ILC. To allow the marriage of banking and commerce is bad public policy that could lead to impartial credit decisions and further deterioration of main street America. Wal Mart has a history of de-stabilizing communities. I have personally witnessed the demise of local retailers as Wal Mart enters a community. In a relative short period of time long time family owned businesses and sole proprietors are replaced with empty store fronts and low paying part time jobs at the local Wal Mart.

Congress reaffirmed its opposition to the mix of banking and commerce with passage of Gramm-Leach - Bliley Act. Given their track record, it is hard to imagine a Wal Mart bank that would be receptive to a loan request from any type of retail competition. To allow such concentration of economic power would be irresponsible. Please put this monster to rest and do not allow Wal Mart entry into banking.

Respectfully,
Thad G. Geiger
EVP

Done 21
(Pruman?)